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Subject:	LWG's FSP for TZW at Gunderson
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Eric & Chip,
Here are DEQ's comments on the LWG's 8/17/07 "*RD 3 GW Pathway Assessment- FSP for Stratigraphic Coring & Bulk Sediment- Gunderson*".

General Comments

1) DEQ is concerned with the LWG's proposal to evaluate whether a complete contaminant transport pathways exists based on stratigraphic information alone. Ideally groundwater & TZW data are needed to complete the contaminant transport picture & support a decision. A combined coring program & groundwater sampling program could likely resolve the questions in one field effort. If not, it would set-up the basis for a focused follow-up phase. Previously, other parties (Siltronic & Arkema) have utilized quick turn-around lab efforts to inform the field program & allow for scope modifications to address contaminant distribution, fate & transport questions.

2) DEQ is also concerned that the FSP does not propose TZW sampling. We recommend collecting TZW samples rather than collecting bulk sediment samples & using equilibrium partitioning to estimate TZW contaminant concentrations as the LWG proposes.

Specific Comments

1) Data Collection Objectives (Section 4.0)- To meet the data collection objectives of the FSP, DEQ proposes modifying the sampling approach as follows:

- An additional section (Z-Z') that bisects the angle between X-X' & the shoreline should be projected offshore. The angle between X-X' & Y-Y' increased for additional spatial coverage;
- Two (& a contingent 3rd) arcs centered on X-X' should be drawn to connect points on X-X', Y-Y', and Z-Z' located approximately 500 feet & 1,000 feet offshore of Gunderson;
- Two arcs of drilling/sampling locations should be located at each of the 6 points on X-X', Y-Y', & Z-Z'; &
- TZW, bulk sediment, &/or groundwater samples (collected from [with increasing depth] the silt, sand, & gravel), & sediment cores should be collected using push-probe drilling equipment at each of the 6 locations during a single sampling event.

Within 500 & 1,000 feet of the shoreline of the Gunderson site, this approach will determine 1) whether & at what depths the sand/gravel occurs offshore, & 2) provide data to assess the concentrations of VOCs, if any, in TZW, bulk sediment, & the silt, sand, & gravel units beneath the river at six locations where VOCs have a higher potential of occurring.

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